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## REMARKS

### I. Status Summary

Claims 1-31 are pending in the present application. Claims 1, 12, and 22 have been amended. Therefore, upon entry of this Amendment, claims 1-31 will be pending. Reconsideration of the application as amended and based on the arguments set forth hereinbelow is respectfully requested.

### II. Claim Rejection Under 35 U.S.C. § 102

Claims 1-31 stand rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,154,534 to Bredberg et al. (hereinafter, "Bredberg"). This rejection is respectfully traversed.

Independent claims 1, 12, and 22 respectively recite methods and a signaling message routing node where different database segments are stored on different processing modules in a routing node. The routing node receives a signaling message and identifies the processing module to process the signaling message. Each of the claims has been amended to recite that the different database segments are stored on different processing modules located within the routing node. Storing a database, such as an LNP database, in a routing node eliminates the need for multiple network elements as taught by Bredberg and thereby reduces cost. Dividing different segments of the database among different processing modules within the routing node reduces the time for performing lookups, such as number portability translation lookups. A further advantage of storing an LNP database on a routing node that identifies the

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appropriate internal processing module for processing a signaling message over a

solution where different segments of the LNP database are distributed across multiple

nodes as disclosed in <u>Bredberg</u> is that the routing-node-based solution does not require

end office switches to have the intelligence for selecting the correct node among

multiple nodes for performing a number portability translation. In <u>Bredberg</u>, the end

office service switching point (SSP) selects among the multiple LNP network elements

(See column 5, lines 19-26 of <u>Bredberg</u>.)

There is absolutely no disclosure, teaching, or suggestion in <u>Bredberg</u> of a
system where multiple database segments are divided among processing modules
within a routing node. Rather than disclosing that LNP data can be dividing among
processing modules within a single network element, <u>Bredberg</u> discloses that LNP data
is divided among <u>different</u> network elements. For example, <u>Bredberg</u> states:

> The SMAS interfaces with **a plurality of LNP network elements 46-48**
> through the request queue **45** based on MPA-NXXs. The routing may be
> set up to route all NPAs to one LNP network element, or a range operation
> may be utilized to route a specific range of NPA-NXXs to each LNP
> network element. For example, West Coast NPA-NXXS may go to LNP
> network element **46**, Central NPA-NXXs to LNP network element **47**, and
> East Coast NPA-NXXs to LNP network element **48**. In the present
> invention, the LNP network elements are deployed singly, and a single
> backup LNP network element **49** is loaded with all ported number data
> and can be brought online if one of the primary LNP network elements **46-
> 48** fails. (Emphasis added.) (See column 5, lines 6-18 of <u>Bredberg</u>.)

From this passage, <u>Bredberg</u> teaches that LNP data can be distributed among <u>a</u>

<u>plurality of network elements</u>. In other words, <u>Bredberg</u> teaches a system where

multiple different network elements contain different segments of LNP data. There is

absolutely no teaching or suggestion of distributing LNP data among different

processing modules within a routing node. Accordingly, for this reason, it is respectfully

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submitted that the rejection of claims 1, 12, and 22 and their dependent claims as

anticipated by <u>Bredberg</u> should be withdrawn.

In the Official Action, on page 2, it is indicated that column 4, lines 15-45 of
<u>Bredberg</u> disclose the invention as claimed. Applicants respectfully disagree. Column
4, lines 15-45 of state as follows:

> FIG. 3 is a simplified block diagram of the Local Number Portability (LNP)
> network configuration of the preferred embodiment of the present
> invention. The NPAC **11** interfaces with a modified LSMS **32** of the
> present invention through the CMISE interface **16**. The LNP data may also
> be divided on the basis of the NPA-NXX, and be distributed to several
> LSMSs. Each LSMS **32** then interfaces with several LNP network
> elements **12-20**. The LNP network elements may be SCPs and/or LNP
> relay nodes. A LNP relay node is part of a STP that performs 10-digit
> Global Title Translations (GTT) for local number portability. The SCPs and
> the LNP relay nodes may be implemented separately or may be combined
> in a single LNP network element. GTT data is then sent to the LNP relay
> nodes, and Location Routing Number (LRN) data is sent to the SCPs.
> In the present invention, dedicated LNP network elements are deployed to
> serve specific ranges of telephone numbers rather than loading the entire
> national LNP database of ported numbers, which may number in the
> millions of subscribers, into every node. The amounts of data stored in
> each LNP network element may vary widely, providing a very flexible
> network configuration. A single backup LNP network element **20** is then
> implemented and loaded with the entire national LNP database so that the
> LNP network element **20** may function as a backup to any of the primary
> LNP network elements **17-19**. The invention, of course, is not limited to
> any one configuration of LNP network elements. For example, some of the
> LNP network elements with extremely heavy traffic loads may be
> implemented as mated pairs while a plurality of other LNP network
> elements rely on a single backup LNP network element.

The above-quoted passage from <u>Bredberg</u> indicates that the LNP data is divided among

multiple network elements. For example, the passage states, "In the present invention,

dedicated LNP network elements are deployed to serve specific ranges of telephone

numbers rather than loading the entire national LNP database of ported numbers, which

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may number in the millions of subscribers, in every node." The sentence that states, "[t]he LNP relay nodes may be implemented separately or may be combined into a single network element," means that the SCP and LNP relay functions illustrated in Figure 3 can be combined into a single network element. There is absolutely no teaching or suggestion in this passage or elsewhere in Bredberg of combining the LNP database segments in a single network element with processors having different segments of the LNP database as claimed. Accordingly, for this additional reason, the rejection of the claims as anticipated by Bredberg should be withdrawn.

### III. Claim Rejection Under 35 U.S.C. § 103

Claims 6, 7, 11, 14, and 24 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Bredberg. This rejection is respectfully traversed.

Claims 6, 7, and 11 depend from claim 1. Claim 14 depends from claim 12. Claim 24 depends from claim 22. As stated above with regard to the rejection of the claims as anticipated by Bredberg, Bredberg fails to teach or suggest distributing different segments of a database among processing modules within a routing node or using the routing node to identify the internal processing module that contains a database segment for processing a received signaling message. In contrast, Bredberg teaches that different segments of an LNP database are distributed among a plurality of different network elements 46-48 and that the end office SSPs select the processing module to which an LNP query should be sent. In addition, Bredberg teaches away

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from locating a complete set of LNP data on a single node.  For example, Bredberg

states:

> It would be advantageous to have a method of populating the nodes that
> did not require that the entire national LNP database be loaded into each
> node. (See column 2, lines 39-52 of Bredberg.)

From this passage, Bredberg teaches away from locating a complete set of LNP data

on a single node.  Thus, for this reason and the reasons stated above with regard to the

rejection of claims 1, 12, and 22 as anticipated by Bredberg, it is respectfully submitted

that the rejection of claims 6, 7, 11, 14, and 24 as unpatentable over Bredberg should

be withdrawn.


## CONCLUSION

In light of the above amendments and remarks, it is respectfully submitted that

the present application is now in proper condition for allowance, and an early notice to

such effect is earnestly solicited.

If any small matter should remain outstanding after the Patent Examiner has had

an opportunity to review the above Remarks, the Patent Examiner is respectfully

requested to telephone the undersigned patent attorney in order to resolve these

matters and avoid the issuance of another Official Action.

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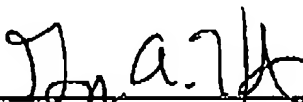Serial No.: 10/607,740

## DEPOSIT ACCOUNT

The Commissioner is hereby authorized to charge any fees associated with the filing of this correspondence to Deposit Account No. 50-0426.

Respectfully submitted,

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